

RANDY SCOTT ZELIN, P.C.

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OF COUNSEL:
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November 20, 2007

Via ECF

The Honorable Victor Marrero
United States District Judge
United States District Court, S.D.N.Y.
Daniel P. Moynihan Federal Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Moheed Oasman, a/k/a "Feisal"
Criminal Docket No. CR-07- 837 (VM)

Dear Judge Marrero:

Douglas T. Burns and I represent Moheed Oasman. Our client is next scheduled to appear before your Honor for a status conference on December 21st, 2007. Please let this letter serve as an application for (1) permission to change Mr. Oasman's place of residence from Georgia to Queens, New York; (2) permission for our client to go to work to support his family and otherwise meet his obligations, and (3) permission for him to travel to New York from December 6th through December 10th, 2007. The government has previously raised an objection to the move and work request; we have not spoken to the government about this latest travel request.

Change of residence to New York

Mr. Oasman seeks to change his residence from Georgia to New York. His New York address, if approved by the Court, will be 126-03 134th Ave., South Ozone Park, New York.

The reason for this request is that it is becoming too burdensome for Mr. Oasman to assist in his defense from his present residence in Georgia. It is a financial hardship on the family as well. Mr. Oasman really needs to be here in the metropolitan area to work with us in preparing for trial.

Employment

As the Court knows, Mr. Oasman is presently on "24/7 lockdown" status. He is not permitted to go to work. The problem is that he is married with two children, ages seven (7) and (4). The family is unable to meet their obligations in the absence of Mr. Oasman's income, and it is becoming a real hardship for the entire Oasman family. .

If he is permitted to relocate to New York, Mr. Oasman is in a position to go to work as a realtor in the family real estate business. We can provide the Court and Pre-Trial Services with a detailed daily itinerary for Mr. Oasman's workday – hours of employment; specific hours spent behind a desk in the office; specified times and location boundaries when and where he can visit properties; a chaperone while he is visiting properties.

Travel request

Request is respectfully made for my client to come to New York from December 6th, 2007 through December 10th, 2007 in order to assist in his defense, which will include, among other things, reviewing the discovery. Mr. Oasman will also be looking into AA and NA treatment/meeting locations, should the Court entertain his change of residence application.

His itinerary is:

December 6th : 7:07 pm flight out of Georgia arriving into LaGuardia Airport at 9:20 pm; Reside at the 126-03 134th Ave., South Ozone Park, New York address while in New York, except to visit us to work on his case, and with the added right to visit with prospective AA and NA treatment centers/locations as part of his continued drug and alcohol counseling.

December 10th: Return to Atlanta, Georgia on an 8:35 pm flight from LaGuardia Airport.

Thank for your kind consideration. Have a Happy Thanksgiving.

Respectfully submitted,

RANDY SCOTT ZELIN, P.C.

By:


RANDY SCOTT ZELIN

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cc: AUSA Gruenstein by ECF
Jack Briscoe PTS Officer (by fax)